

National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



October 4, 2012

Reply to Attch of

CC-A

TO: Distribution

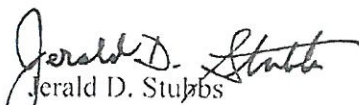
FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at the Economic Development  
Commission Annual Meeting, October 24, 2012

On October 24, 2012, the Economic Development Commission (EDC) will hold its Annual meeting at the King Center for the Performing Arts in Melbourne, Florida. Approximately 200 guests are expected to attend. These guests include members of academia, local elected officials, representatives from the aerospace industry, local businesses, local non-profit organizations, the media, and NASA officials. At the conclusion of the meeting, the EDC will host a networking dinner. The ticket price to attend this event is \$45 a person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having invited NASA personnel attend. This event will provide an opportunity for reviewing information on change management and transformation and for celebrating the successes over the past year. In addition, attendees will be in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and for discussing matters of interest to NASA.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event. NASA employees whose duties may substantially affect any of the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.

  
Gerald D. Stubbbs  
Agency Designee

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